

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal Case No. 20-CR-157-LM-01
DIANA DYSON,)	
Defendant)	
_____)	

INFORMATION

The United States Attorney Charges:

COUNT ONE

[18 U.S.C. §§ 2, 1344 – Aiding and Abetting Bank Fraud]

1. TD Bank was a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”).
2. Beginning on an unknown date, but at least by on or about February 28, 2020, in the District of New Hampshire and elsewhere, the defendant,

DIANA DYSON,

intentionally aided and abetted A.W. to execute and attempt to execute a scheme and artifice to commit bank fraud. DYSON drove A.W. to TD Bank branches in New Hampshire for the purpose of fraudulently withdrawing money from other persons’ bank accounts. A.W. entered the branch locations and withdrew and attempted to withdraw money from other persons’ bank accounts using those persons’ bank account numbers and false drivers’ licenses that contained their personal identifying information and A.W.’s photograph.

3. On the dates and at the bank branches charted below, DYSON drove A.W. to the following bank branches to fraudulently withdraw or attempt to withdraw money from other persons’ bank accounts:

Date	Account No.	Bank / Branch	Amount Withdrawn or Attempted to be Withdrawn
2/28/2020	-7307	TD Bank / 277 Sheep Davis Road, Concord, NH	\$4,275
2/28/2020	-7307	TD Bank / 143 North Main Street, Concord, NH	\$4,300
2/28/2020	-0359	TD Bank / 1886 Dover Rd, Epsom, NH	\$3,275
2/28/2020	-0359	TD Bank / 50 Glass St., Pembroke, NH	\$1,600 (attempt)

All in violation of Title 18, United States Code, Sections 2 and 1344.

NOTICE OF CRIMINAL FORFEITURE PURSUANT TO
18 U.S.C. § 981(A)(1)(c) AND 28 U.S.C. § 2461(c)

The allegations in Count One are re-alleged for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(A)(1)(c) and 28 U.S.C. § 2461(c). Upon conviction, the defendants shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

All in accordance to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

DATED: December 16, 2020

SCOTT W. MURRAY
United States Attorney

/s/ Matthew T. Hunter
Matthew T. Hunter
Assistant United States Attorney